

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCOTT RODGERS)	C.A. No. 04-11842-PBS
Plaintiff,)	
)	
v.)	
)	
CORRECTION OFFICER ORCHID,)	
UNKNOWN CORRECTION OFFICER JOHN)	
DOE, JOE WHITMORE, DR. HOWARD,)	
JOHN SMITH, PLYMOUTH COUNTY)	
Defendants.)	
)	

ASSENTED-TO MOTION TO EXTEND DEADLINES

Now comes the Plaintiff in the above-entitled matter and hereby moves this Court to extend all deadlines in the discovery plan for an additional ninety days. As grounds therefore, the Plaintiff states the following:

1. Defendant Howard was initially represented by attorneys for the Plymouth County Sheriff's Office.
2. Howard is no longer represented by any counsel and, until recently, Plaintiff was not in possession of his address for service of notices of deposition and other court filings.
3. The Plaintiff is now in possession of a verified address for Defendant Howard.
4. As such, additional time is needed to take depositions.
5. Counsel for all Defendants assent to this motion.

Respectfully submitted,
The Plaintiff Scott Rodgers,
By his attorneys,

DATED: March 24, 2006

//s// Michael Tumposky
Stephen Hrones (BBO No. 242860)
Jessica D Hedges (BBO No. 645847)
Michael Tumposky (BBO No. 660618)
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CERTIFICATE OF SERVICE

I, Michael Tumposky, hereby certify that on this 24th day of March, 2006, I served a true and correct copy of the foregoing where unable to do electronically on all counsel of record in this matter.

//s//Michael Tumposky
Michael Tumposky